Remarks/Arguments

The Examiner is thanked for the careful review of this Application. Claims 1-22 are pending after entry of the present Request for Reconsideration.

Rejections under 35 U.S.C. § 102(e)

Claims 1-19, 21, and 22 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,031,577 to Ozkan et al. (hereinafter "Ozkan"). These rejections are traversed as the cited art of record fails to disclose each and every feature of the claimed invention, as defined in independent claims 1, 7, 11, 15, 21, and 22 for at least the following reasons.

The Office has rejected the Applicants' argument that Ozkan does not disclose an interconnect, as defined in the claimed invention. The Office interprets the single channel lines between the storage device and the display or the NTSC/PAL encoder in Figure 1 of Ozkan to be equivalent to the interconnect, as defined in the claimed invention. The Applicants respectfully disagree with the Office's interpretation. In the claimed invention, the bulk decoder transmits the decoded data to an interconnect. As is well known, transmitting data is achieved via a communication line. In the claimed invention, data is transmitted to the interconnect via a communication line coupled to the interconnect. In the same manner, data is transmitted to the display via a communication line coupled to the interconnect. In the specific examples provided by the Office, however, only a single path exists between each of the display and the alleged bulk decoder. Such single paths have been interpreted to be equivalent to the interconnect of the claimed invention. Thus, in Ozkan, the decoded data is transmitted from the decoder to the display, directly, via the same connection interpreted to be the interconnect by the Office. However, each of the single paths referred to by the Office cannot function as both, an interconnect as well as the communication line needed for the bulk decoder to transmit the data to the display or the storage.

Furthermore, the NTSC/PAL encoder of Ozkan is an encoder and is used in the alleged bulk decoder of Ozkan to perform the functions of an encoder. That is, the NTSC/PAL encodes the decoded data, outputting encoded data. In the claimed invention, however, decoded data is transmitted to the interconnect and <u>decoded data is delivered to the output device.</u> Thus, Ozkan the NTSC/PAL of Ozkan is not the same, and cannot perform the same functions as the interconnect, as defined in the claimed invention.

Furthermore, the Office has rejected the Applicants' argument that the alleged processor taught in Ozkan fails to convert a signal including intermixed data into single protocol signals. In rejecting the Applicants' arguments, the Office interprets Ozkan's separation of intermixed signals by the demultiplexer into separated signals to be equivalent to converting a signal

including intermixed data into single protocol signals, as defined in the claimed invention. The Applicants respectfully disagree with the Office's interpretation. In the claimed invention, as defined in claims 7, 21, and 22, a signal having intermixed data as received from the network is separated into a single protocol signal. By way of example, in the claimed invention, when the signal has intermixed data, the signal includes more than one type of data (i.e., audio, video data, etc.). However, each of the audio and video data types can have multiple protocol formats (e.g., MPEG, JPEG, H.261, etc.). Thus, in the claimed invention, not only a signal including intermixed data can be decoded into different types of signals, audio signals or video signals having different protocols are also converted into respective designated single protocol. The alleged processor of Ozkan, however, cannot convert a signal type having different protocols into a single protocol. In fact, the sub-picture processor disclosed in Ozkan can only decode and decompress subpicture data that includes text messages, thus, not intermixed data and/or a single protocol signal. Thus, Ozkan fails to disclose each and every feature of the claimed invention, as defined in independent claims 7, 21, and 22.

Accordingly, the Applicants respectfully submit that independent claims 1, 7, 11, 15, 21, and 22 are patentable under 35 U.S.C. § 102(e) over Ozkan. Similarly, dependent claims 2-6, 8-10, 12-14, and 16-19 each of which directly or indirectly depend from respective independent claim are taught to be patentable for at least the same reasons discussed above.

Rejections under 35 U.S.C. § 103(a)

The Office has maintained rejection of claim 20 under 35 U.S.C. 103(a), as being unpatentable over Ozkan in view of the paper entitled "Real-Time Parallel MPEG-2 Decoding in Software" to Bilas et al. (hereinafter "Bilas"). The Applicants respectfully traverse this rejection as the combination of the cited prior art fails to raise a *prima facie* case of obviousness against the subject matter defined in dependent claim 20 for at least the reasons provided below.

It is respectfully submitted that Bilas, taken as a whole and in its entirety, leads away from adjusting the number of processors coupled to the network in accordance with the system load. In rejecting claim 20, the Office has dismissed that Bilas allocates a specific number of processors to each picture. Some of such processors can remain idle until all the allocated processors have concluded processing their portion of the picture. That is, Bilas starts execution of each picture with a specific number of allocated processors and does not add more processors or release some of the allocated processes until the entire picture is processed. Furthermore, Bilas states that processors should be added when the load is divided equally between the processors. In the claimed invention, however, the number of bulk decoders can be adjusted based on the system load. For instance, in the claimed invention, once the bulk decoder has concluded processing the assigned process, the bulk decoder does not have to wait idle until processing the picture has completed. Rather, in the claimed invention, the bulk decoder can
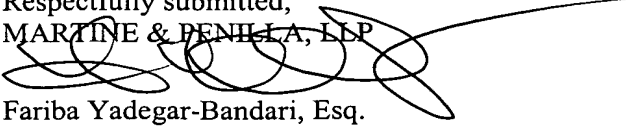
process data fed by a live data source or a media archive data source. This can occur while other bulk decoders of the same group are still being used to process the specific picture.

In the same manner, Ozkan fails to disclose, teach, or suggest adjusting the number of bulk decoders attached to the network in accordance with system load. Thus, if the two references were combined (if the two references are combinable), the combination of the cited prior art fails to teach or suggest adjusting the number of decoders in accordance with the system load.

Yet further, the combinations of the cited references fail to disclose, teach, or suggest all the claim limitations as provided in the claimed invention. By way of example, among other features, in Bilas, the processors cannot be shared between different multiprocessors. Nor does Bilas teach or suggest using processors that can be shared or that are capable of handling more than a single data format. Additionally, the processors in Bilas have not been taught or suggested to be able to decode a signal including intermixed data into a single protocol signal. Bilas further fails to teach or suggest using an interconnect and transmitting the decoded data to the interconnect. As such, Bilas fails to cure any of the deficiencies associated with Ozkan, as provided in more detail with respect to the novelty rejections. Thus, dependent claim 20 is patentable over any combination of the cited prior art. Accordingly, the Applicants respectfully request that rejection of claim 19 under U.S.C. 103(a) over the cited prior art be withdrawn.

The Applicants hereby submit that this Request for Reconsideration complies with 37 C.F.R. 1.116(b) and should be entered.

In view of the foregoing, the Applicants respectfully submit that all of the pending claims 1-22 are in a condition for allowance. Accordingly, a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present Amendment, the Examiner is kindly requested to contact the undersigned at (408) 774-6913. If any additional fees are due in connection with filing this Amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. SUNMP580). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
MARTINE & PENILLA, LLP

Fariba Yadegar-Bandari, Esq.
Reg. No. 53,805

710 Lakeway Drive, Suite 200
Sunnyvale, CA 94085
Telephone: (408) 774-6913
Facsimile: (408) 749-6901
Customer Number: 32291